

REMARKS

The present Amendment and Response is in response to the Office Action, dated February 5, 2004, where the Examiner has rejected claims 9-32. By the present Amendment and Response, applicants have amended claims 9, 17 and 25. Accordingly, after the present Amendment and Response, claims 9-32 are pending in the application. Reconsideration and allowance of pending claims in view of the amendments and the following remarks are respectfully requested.

A. Changes to the Specification

By the present amendment, applicants have corrected a number of clerical errors in the written description, as shown above. It is respectfully submitted that no new matter has been added.

B. Rejection of Claims 9-32 under 35 USC § 102(e)

The Examiner has rejected claims 9-32 under 35 USC § 102(e), as being anticipated by Foltan et al. (USPN 6,667,972) (hereinafter "Foltan"). Applicants respectfully disagree.

To further clarify the invention of claim 9, applicants have amended claim 9 to state that the establishment module, in response to the voice connection request, establishes a modem interface for use with the modem API and establishes a voice interface for use with said voice module. Further, claim 9 has been amended to recite: "wherein said device driver establishes said modem interface to represent said voice connection to said application program as a modem connection to facilitate said voice connection using said application program communicating with said modem interface using said modem API using said plurality of modem calls."

Applicants respectfully submit that Foltan merely stands to show a system that supports fax, video, voice and data, which must naturally include respective fax module, video module, voice module and data module and related interfaces for supporting such features. However, Foltan does not disclose, teach or suggest a device driver that makes the API and/or the operating system think that they are communicating with a modem module, where in fact they are communicating with a voice module. For example, the Examiner's attention is directed to page 14, lines 13-18 of the present application, which reads:

Various embodiments implement the modem-like connection differently, but exemplary techniques include formulating a modem connection in device driver 222 such that operating system 138 "thinks" that data sessions with voice module 202 are modem connections instead of voice connections.

Applicants respectfully submit that claim 9, as amended, clarifies the above distinction by stating: "wherein said device driver establishes said modem interface to represent said voice connection to said application program as a modem connection to facilitate said voice connection using said application program communicating with said modem interface using said modem API using said plurality of modem calls." In other words, in response to a request by the application program for a voice connection, the device driver provides a modem connection (not a voice connection), and makes the host "think" that it is talking to a modem module, because the modem interface communicates with modem API using modem calls, but the interaction module converts the data from the modem interface and generates converted data for use by the voice module. As a result, unbeknownst to the modem API and the application program, the device driver is facilitating a voice connection by interfacing with a voice module, although it looks like a modem connection to the modem API and the application program.

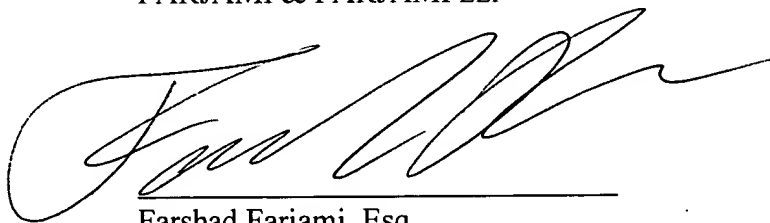
Accordingly, at least for the reasons stated above, it is respectfully submitted that claim 9 and its dependent claims 10-16 should be allowed.

Furthermore, independent claims 17 and 25 include limitations similar to those of claim 9, and thus, claims 17 and 25, and their respective dependent claims 18-24 and 26-32 should also be allowed.

C. Conclusion

For all the foregoing reasons, an early allowance of claims 9-32 pending in the present application is respectfully requested. The Examiner is invited to contact the undersigned for any questions.

Respectfully Submitted;
FARJAMI & FARJAMI LLP

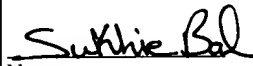


Farshad Farjami, Esq.
Reg. No. 41,014

Farshad Farjami, Esq.
FARJAMI & FARJAMI LLP
16148 Sand Canyon
Irvine, California 92618
Telephone: (949) 784-4600
Facsimile: (949) 784-4601

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